

4. Plaintiff commenced this civil action against Defendants in the Superior Court of New Jersey, Law Division, Mercer County by Complaint filed on or about December 4, 2017. On December 11, 2017 an amended complaint was filed. Defendant Sirridge was served with Plaintiff's Complaint on or about December 16, 2014. (A copy of the proof of service is attached hereto and made part hereto as Exhibit "B") Upon information and belief, National Carriers, Inc. was served the Complaint and then the amended Complaint on December 18, 2017 and December 20, 2017 respectively. (See attached proof of service attached collectively as Exhibit "C") Therefore, this Notice of Removal to Federal Court is timely filed.

5. Plaintiff alleges the following in his Amended Complaint:

As a result, Plaintiff, David Keller sustained severe external and internal injuries of a permanent and disabling nature, suffered great pain, was prevented from attending to his usual affairs and occupation, incurred expenses for medical and hospital care.
(See Exhibit "A," First Count, Paragraph 3).

6. Based upon a fair reading of the Complaint, Plaintiffs have set forth claim in which the amount in excess of the jurisdictional limit of \$75,000.00, exclusive of interest and costs, may be at stake.

7. Diversity of citizenship within the meaning of 28 U.S.C. §1332 exists between Plaintiff and Defendants as no defendant is a citizen of New Jersey. See paragraphs 1 through 6 above.

8. Furthermore, diversity of citizenship existed at the time the action sought to be removed was commenced and continues through the time of filing of this notice, such that Defendant is entitled to removal pursuant to 28 U.S.C. §1441 as amended, and 28 U.S.C. §1446.

WHEREFORE, Defendant, Robert A. Sirridge and National Carriers, Inc. (improperly named as National Carriers), prays that the above captioned action now pending in the Superior

Court of New Jersey, Law Division, Mercer County, be removed therefrom to this Honorable Court.

RAWLE & HENDERSON LLP

A handwritten signature in black ink, appearing to read "Delia Clark", with a long horizontal flourish extending to the right.

By: _____
Delia A. Clark
Attorneys for Defendants,
Robert Sirridge and National Carriers, Inc.
40 Lake Center Executive Park, Suite 200
401 Route 73 North
Marlton, New Jersey 08053
856-596-4800

Dated: January 16, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of January, 2018 a copy of Defendants Notice of Removal and 7.1 Disclosure Statement was served via facsimile and first-class mail, postage prepaid, on the following:

Michael W. Krutman
Law Office of Michael Krutman
2525 Nottingham Way
Hamilton, NJ 08619

RAWLE & HENDERSON, LLP

Delia A. Clark
Attorney for Defendants